

FREEMAN, NOOTER & GINSBERG
ATTORNEYS AT LAW

LOUIS M. FREEMAN
THOMAS H. NOOTER*
LEE A. GINSBERG

75 MAIDEN LANE
SUITE 503
NEW YORK, N.Y. 10038

*NY AND CALIF. BARS

(212) 608-0808
TELECOPIER (212) 962-9696

February 18, 2021

The Honorable Laura Taylor Swain
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

MEMO ENDORSED

Letter Motion
CONSENT Relocation Request

RE: United States v. Brandon Alvarez, 19 Cr. 23 (LTS)

Your Honor:

I am writing to ask the Court to grant permission for my client to relocate immediately to Florida, to live there with his father (who is now out of the hospital) until he has to surrender to serve his sentence (current surrender date is March 26, 2021).

The reason he has to move is that he is separating from his girlfriend, who is the leaseholder on the apartment he is now in, and she wants him out right away, but he has no other place to live.

I have consulted with AUSA Nicholas Chiuchiolo, Esq., and Pre-Trial Services Officer Erin Cunningham, and neither has any objection.

My client will live at 139 Lazy Willow Drive, in Davenport, Florida, and will maintain contact with me and with his Pre-Trial Services Officer.

Thank you so much.

The requested permission is granted.
DE#75 resolved.
SO ORDERED.
2/18/2021
/s/ Laura Taylor Swain, USDJ

Sincerely,

/s/ Thomas H. Nooter
THOMAS H. NOOTER
Attorney for Defendant Alvarez

cc: AUSA Nicholas Chiuchiolo, Esq., by ECF and email
PTSA Officer Erin Cunningham, by email.